

## ROP Renewal Pre-application Meeting Procedure and Timeline

**Objective:** Meeting of company and AQD representatives to discuss the ROP application process and to develop a schedule for submitting the ROP Renewal Application. Discussion topics should include: status of facility (compliance, changes, etc) and any associated revisions to the existing ROP, including any proposed modifications and any new applicable requirements. During the meeting, a timeline for ROP development should be drafted by the AQD and company.

### Procedures:

1. Eighteen months prior to ROP expiration, District sends out ROP renewal reminder letter to company (word > file > new > custom or personal > ROP Renewal Reminder Letter).
2. District staff add a pre-application meeting reminder in Outlook (or other planner) for two months from the date the letter is sent.
3. In the event the company does not contact the District within two months of the renewal reminder letter, AQD District staff should contact the company to schedule the pre-application meeting. If the company declines meeting, document the reason in the file.
4. The meeting should be scheduled no less than 1 year prior to expiration of the ROP.
5. AQD staff should conduct a compliance review of the facility prior to the pre-application meeting. The compliance review should include an FCE within two years prior to the pre-application meeting.
6. The meeting should include the environmental contact(s) for the company, AQD District staff, AQD Permit Writer, and District Supervisor.
7. During the meeting, the following information should be discussed. (This information can be requested from the company ahead of the meeting to allow time to review and to determine any additional information needs.)
  - a. The current compliance status of the facility. Issues of unresolved non-compliance should be discussed and a determination made as to how to address these issues within the renewed ROP.
  - b. Any changes proposed or implemented at the facility since issuance of the current ROP. This includes changes in equipment, process, location, and contacts.
  - c. Any ROP modifications planned or that have been submitted to the AQD since issuance of the current ROP.
  - d. Any new Permits to Install (PTIs) issued since issuance of the current ROP.
  - e. Any new applicable requirements or new regulations that may apply since issuance of the current ROP. This includes any new federal or state requirements.
  - f. The company should be directed to the website where an electronic version of the current ROP can be obtained.
  - g. The company should be directed to the AQD website where the application form and any necessary permit templates (EU/FG, MACT, etc...) can be obtained for development of the mark-up ROP as part of the renewal application package.
8. An initial proposed schedule for issuance of the renewal ROP will be drafted using the timeline template available in Excel in the ROP Manual under "Timeline" in Tab 1.A or in Word as "*ROP Renewal Application Processing Timeline*." The schedule should include a date by which the company anticipates submitting the ROP renewal application.
9. The timeline will be finalized upon receipt by AQD of an administratively complete application, regardless of whether a pre-application meeting was held. The timeline will include dates for technical review, submittals of requested additional information (if needed), completion of working draft ROP, company review, draft permit, public comment, public hearing (if necessary), EPA review and proposed issuance date. The timeline will be printed for the file and saved to the local network drive in the appropriate ROP folder (where it can be updated). Also, the secretary will mail a copy of the timeline to the Responsible Official (RO) with the Administratively Complete letter and also email a copy of both to the RO as well as the company contact and the consultant (if applicable).

## ROP Renewal Application Processing Timeline

**Facility Name:**

**SRN:**

**Pre-Application Meeting Date:**

**Due Date:**

<b>Task</b>	<b>Timeline Recommendation</b>	<b>Proposed Submittal Date / Date Received</b>	<b>Date Completed</b>	<b>Comments</b>
Application to be submitted	12 months prior to expiration		00/00/0000	
Administrative Completeness Check	15 calendar days			
Technical Review Complete -- including all additional information requests and completion of draft staff report and working draft ROP	7 months			
Company Review Working Draft ROP	21 calendar days (21-30 day review)			
Address Company Comments Convert Working Draft ROP to Draft ROP, Finalize Staff Report	14 calendar days			
Post Public Notice/Calendar Notice	7 calendar days			
Public Comment/Affected States Review (Draft Permit)	30 calendar days			
Public Hearing if requested	0 calendar days (45 days if requested)			
Revisions/Company Review (if needed). Convert Draft ROP to Proposed ROP, Add addendum to Staff Report	16 calendar days			
EPA Review (Proposed Permit)	45 calendar days			
Issue Permit	5 calendar days			